

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 2:21-cv-1478
)	
)	
\$58,359.00 IN UNITED STATES)	
CURRENCY,)	
)	
Defendant.)	

VERIFIED COMPLAINT FOR FORFEITURE

AND NOW comes the United States of America, by and through its counsel, Stephen R. Kaufman, Acting United States Attorney for the Western District of Pennsylvania, and David Lew, Assistant United States Attorney for the Western District, and respectfully represents as follows:

1. Plaintiff, the United States of America, brings this civil action *in rem* for forfeiture to the United States of \$58,359.00 in United States currency (the "Defendant Currency") pursuant to 21 U.S.C. § 881(a)(6).
2. Jurisdiction is predicated upon 28 U.S.C. § 1345 and § 1355(a). Venue is proper under 28 U.S.C. § 1395 and § 1355(b).
3. On April 28, 2021, a federal search warrant was executed at an apartment located on 75th Street in Chicago, Illinois ("the 75th Street apartment") that was the residence of Nadia Wilkins ("Wilkins").
4. The search warrant arose from the investigation of a drug trafficking organization involving Anthony Cook ("Cook") and others that distributed narcotics within the Western

District of Pennsylvania. Wilkins was known to be the girlfriend of Cook, and during the investigation law enforcement observed Cook entering and leaving the 75th Street apartment.

5. The investigation revealed that the 75th Street apartment was used to store and repackage cocaine, and to store cash proceeds of drug sales.

6. During the execution of the search warrant, law enforcement recovered bulk currency and other evidence, including the Defendant Currency, from the 75th Street apartment.

7. The majority of the Defendant Currency, approximately \$55,000.00, was found in a bedroom closet of the 75th Street apartment. Additional portions of the Defendant Currency were found in a dresser and nightstand drawers.

8. Additionally, Wilkins admitted to investigators that Cook stayed at the 75th Street apartment on occasion.

9. Following the search of the 75th Street apartment, agents took custody of the Defendant Currency.

10. The Federal Bureau of Investigation then instituted administrative forfeiture proceedings against the Defendant Currency. During these proceedings, Nadia Wilkins filed a claim for the Defendant Currency. As a result, the United States has instituted this civil forfeiture action against the Defendant Currency.

11. Based on the above facts, the Defendant Currency is forfeitable to the United States pursuant to 21 U.S.C. § 881(a)(6).

WHEREFORE, the United States of America respectfully requests that process of warrant *in rem* issue for the arrest of the Defendant Currency; that judgment of forfeiture be entered in favor of the United States for the Defendant Currency; and that the United States be granted such relief as this Honorable Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted,

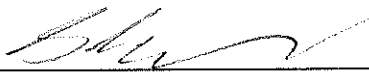
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VERIFICATION

I am a Task Force Officer of the Federal Bureau of Investigation and an agent assigned the responsibility for this case. I have read the contents of the foregoing complaint for forfeiture and the statements contained therein are true and correct to the best of my knowledge and belief.

I verify under penalty of perjury that the foregoing is true and correct. Executed on this 21 day of OCTOBER, 2021.



SHANE W. REAGHARD
Task Force Officer
Federal Bureau of Investigation